



# South Coast Air Quality Management District

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## **Review of the Final Environmental Impact Report (Final EIR) for the Azusa Rock Quarry Revised Conditional Use Permit and Reclamation Plan**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. AQMD staff notes that the lead agency incorporated many of our initial comments into the Final EIR, such as inclusion of more stringent mitigation measures, a revised discussion of terrain effects on modeling output, and additional explanation of some calculation methodologies. However, we request your further consideration of these additional comments prior to certification of the Final EIR.

To ensure air quality impacts are minimized and to ensure the adequate protection of public health, the AQMD staff has additional recommendations to ensure measures committed to in the Final EIR are enforceable. In addition, the AQMD staff is requesting additional clarification to ensure air quality impacts are appropriately communicated to the public. The following comments are intended to provide guidance to the lead agency and should be acted upon prior to certification of the Final EIR and incorporated into the Conditional Use Permit (CUP) as necessary.

### *Baseline Off-Road Fleet Assumptions*

As noted in the Final EIR, the project's impacts to regional NO<sub>x</sub> emissions are just below the AQMD's significance thresholds. The majority of NO<sub>x</sub> emissions are due to off-road mining equipment. AQMD staff was not able to reproduce the baseline year emission rates presented in the Final EIR. Given the small margin of error for potentially significant NO<sub>x</sub> impacts, further justification is required of the NO<sub>x</sub> emissions rates assumed for off-road mining equipment used for the baseline year.

### *2009 Off-Road Fleet*

The Final EIR presents calculations indicating that all off-road mining equipment will use model year 2009 engines. Based on a conversation between the project team and AQMD staff, the project proponent assumes that it will purchase new mining equipment as part of the project, however enforceable conditions should be provided in the CUP that will ensure that these commitments are implemented at the commencement of project activities.

*Curtail Blasting on High Wind Days*

As stated in the Final EIR, the amount of annual blasting associated with project activities is projected to increase from approximately 20 events per year to 100 events per year. As emissions associated with blasting work are high, all measures should be taken to reduce the impact of these emissions on nearby residents. An enforceable condition should be placed into the CUP that limits blasting activity to periods without high wind activity (including Santa Ana winds). High wind activity should be defined and determined in accordance with AQMD Rules 1157 and 403.

*Enforceable Throughput Condition*

AQMD staff notes that the lead agency provided a cap on daily throughput of 19,000 tons per day of aggregate as mitigation measures AQ-1 and AQ-1a. In order to ensure that this measure is enforced, the throughput cap should be included in the CUP.

*Duarte Meteorological Data*

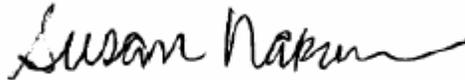
At the request of community members and City of Duarte representatives, AQMD staff completed some additional analysis of modeled project impacts utilizing meteorological data collected from a monitoring station located in the City of Duarte. Use of the Duarte meteorological data presents a more conservative evaluation of impacts from the proposed project. These model results and meteorological data are included as an electronic attachment to this letter. As discussed in the attachment to this letter, the Duarte meteorological data was not collected for the purpose of modeling, hence it does not meet EPA guidance. However, due to significant public interest, staff believes it would be appropriate to present a more robust discussion of the potential health risks posed by the project considering this data prior to approving the Final EIR.

*On Going Monitoring Efforts*

Given the concern about air quality impacts from this mining operation, AQMD staff will pursue conducting additional monitoring activities in order to assess future impacts to local residents. Should significant impacts be identified, AQMD's Executive Officer plans to pursue specific rulemaking and/or permit modifications to protect the public health.

Further details regarding these comments are attached. Staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact either myself or Ian MacMillan, Program Supervisor, CEQA Intergovernmental Review, at (909) 396-3244 if you have any questions regarding the enclosed comments.

Sincerely,



Susan Nakamura  
Planning and Rules Manager  
Planning, Rule Development & Area Sources

Attachment  
SN:IM:DG  
LAC091223-03  
Control Number

## **Off-road Mining Equipment Emissions**

### 1. Baseline year emission rates

As stated on page 4.2-16 of the Draft EIR, baseline emission rates were calculated using the Offroad2007 model, however in a phone call on April 9, 2010 between AQMD staff and the project team, it appears that these emissions may have been calculated using a non-standard approach. AQMD staff was not able to reproduce the emission factors cited in the Final EIR. If the emission rates cited in the Final EIR are overestimated, then the project's impacts may be underreported.

### 2. Proposed project emission rates

The proposed project's off-road equipment emission rates are based on model year 2009 off-road engines. In a phone call with AQMD staff on April 9, 2010, the project team indicated that these engines are not currently operated onsite, but are assumed to be the sole equipment used onsite upon the initiation of project activities. The replacement of the entire mining equipment fleet is not indicated in either the project description or in any mitigation measures. Newer equipment will have lower emissions than the older equipment currently operating onsite. If the project emission rates cited in the Final EIR are underestimated, then the project's impacts may be underreported. An enforceable condition should be included in the CUP that requires the project proponent to only utilize mining equipment that meets or exceeds the emission rate performance standards cited in the Final EIR.

### 3. Equipment fleet

The Draft EIR states in Table 4.2.9 that some mining equipment will be used less (e.g., dozers, loaders) during the project than during the baseline year. As the project proposes to increase throughput five-fold, further justification to clarify the reduced equipment usage should be provided prior to project approval. An enforceable condition should also be placed in the CUP that limits mining equipment emissions to those cited in the Final EIR.

### 4. Choice of baseline year

AQMD staff appreciates the additional discussion presented in the Final EIR stating that the rationale for the selection of 2006-2007 as the baseline year was that it was the most recent data available at the time of preparation of the air quality analysis. However, prior to project approval, further explanation should be provided to the public about why the 2006-2007 timeframe is most representative of typical operations.

## **Modeled Air Quality Project Impacts**

### 5. Meteorological data

At the request of community members and City of Duarte representatives, AQMD staff analyzed project impacts using meteorological data collected in Duarte by AQMD as part of a focused particulate matter monitoring study from 2005 to 2008. Summaries of this data have been presented as part of the aforementioned focused study reports, however the data itself has not previously been published. The meteorological data included wind speed and direction, collected from a height of approximately 6 meters. The data was collected over a period of approximately two years and overlapped with data collection efforts at the AQMD permanent Azusa monitoring station located approximately 1.7 miles to the southeast. As modeling software requires a variety of inputs besides wind

speed and direction, additional parameters (e.g., temperature, cloud cover, etc.) from the Azusa station were substituted into the dataset prior to processing for modeling use. The processed meteorological data is included as an electronic attachment to this letter.

Although the meteorological data collected at the Duarte site does not meet EPA guidelines, the project proponent should present a discussion of the Duarte data prior to project approval.

6. Modeled impacts using Duarte meteorological data

As can be expected, the calm winds associated with the Duarte meteorological dataset yield higher modeled air contaminant concentrations than those found in the Final EIR using the Azusa meteorological dataset. AQMD staff found that by using the Duarte dataset, criteria pollutant concentrations (e.g., NO<sub>x</sub>, PM<sub>10</sub>) did not exceed established thresholds at the closest residence as identified in the Final EIR. However, modeled results of carcinogenic health risks indicate that the closest receptor may potentially experience greater impacts if the Duarte meteorological dataset is used (model files attached on cd). Prior to project approval the project proponent should provide to the public a more robust discussion of the results and any implications of using this alternative dataset.

7. Source area

AQMD staff notes that in the criteria pollutant model files, the modeled excavation area is located in the northwest corner of the property. As the closest residence is located to the southwest of the project, the project proponent should provide to the public the rationale as to why this source of emissions was not modeled at a more southerly location (closer to residences) and what the results might be if it was moved.